

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:

Avalon Post Office
Avalon, Texas 76623

Docket No. A2012-78

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(January 13, 2012)

On November 18, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked November 8, 2011, from the Superintendent of Avalon Independent School District (IDS), Dr. David Del Bosque ("Petitioner") on behalf of the Save the Avalon Post Office organization, objecting to the discontinuance of the Post Office at Avalon, Texas.¹ On December 2, 2011, the Commission issued Order No. 1021, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 1021, the administrative record was filed with the Commission on December 5, 2011. On the following day, December 6, 2011, the Public Representative filed comments recommending that the final determination be affirmed.² The following is the Postal Service's answering brief in support of its decision to discontinue the Avalon Post Office.

The correspondence received by the Commission raises three main issues: (1) the effect on postal services, (2) the impact upon the Avalon community, and (3) the calculation of economic savings expected to result from discontinuing the Avalon Post

¹ This discontinuance was conducted pursuant to Handbook PO-101, dated August 2004, and updated with Postal Bulletin revisions through August 2, 2007.

² The Public Representative concluded that "the Postal Service followed applicable procedures and requirements of 39 U.S.C. § 404(d), that the decision to close Avalon Post Office is neither arbitrary nor capricious, and that the Postal Service's decision is supported by substantial evidence." Public Representative Comments, PRC Docket No. A2012-78 (December 6, 2011).

Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,³ the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Avalon Post Office should be affirmed.

Background

The Final Determination To Close the Avalon, TX Post Office and Continue to Provide Service by Rural Route Service ("Final Determination" or "FD"), as well as the administrative record, indicate that the Avalon Post Office provides EAS-11 level service to 165 Post Office Box customers, and retail customers 42 hours per week. Item No. FD at 2; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"), at 1.⁴ The postmaster of the Avalon Post Office retired on January 1, 2010. Since the postmaster vacancy,⁵ a noncareer officer-in-charge (OIC) has been installed to operate the office. Upon implementation of the final determination, the noncareer postmaster relief will be separated from the Postal Service; however attempts will be made to reassign the employee to a nearby facility.⁶ The average

³ See 39 U.S.C. 404(d)(2)(A).

⁴ The Final Determination can be found at Item No. 47 in the Administrative Record. All citations to the Final Determination will be to "FD at____," Rather than to Item 47. The FD page number refers to the pages as marked on the upper right of the document. Other Items in the administrative record are referred to as "Item No.____."

⁵ The Petitioner in his letter of appeal mentions that the vacancy was never posted and if the vacancy is a reason for closure, the Postal Service made no attempts to fill it. Over the course of the past few years, the Postal Service has experienced several hiring freezes. Whenever there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternative means, which was the case here. This is consistent with Handbook PO-101, which provides that a postmaster vacancy is a suitable justification for commencing a discontinuance study. Of course, the vacancy is not the sole factor motivating this discontinuance action; rather, the totality of circumstances supports the administrative decision at issue here.

⁶ FD at 5.

number of daily retail window transactions at the Avalon Post Office is 17. Revenue has generally been low and declining: \$30,070 in FY 2008 (78 revenue units); \$27,238 in FY 2009 (71 revenue units); and \$22,188 in FY 2010 (58 revenue units).⁷ The Avalon Post Office has three meter or permit customers. Item No. 15, Post Office Survey Sheet, at 1.⁸

Upon implementation of the final determination, delivery and retail services will be provided by rural route service administered by the Italy Post Office, an EAS-16 level office located six miles away, which has 61 available Post Office Boxes. FD at 2; Item No. 18, Form 4920 Post Office Fact Sheet, at 1; Item No. 41, Revised Proposal, at 2. Rural Service will be provided to centralized box units (“CBUs”), which are free standing units of individually locked mail compartments installed and maintained by the Postal Service at no expense to customers. Each CBU has two parcel lockers which provide convenient parcel delivery for customers. FD at 3. This service will continue upon implementation of the Final Determination. FD at 2.

The Postal Service followed the proper procedures which led to the posting of the Final Determination. All issues raised by the customers of the Avalon Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to delivery customers of the Avalon Post Office. Questionnaires were also

⁷ FD at 2; Item No. 18, Form 4920 Post Office Fact Sheet, at 1; Item No. 41, Revised Proposal, at 2.

⁸ The Petitioner notes that the Final Determination does not acknowledge the presence of permit mailers or postage meter customers in the community. Petitioner’s observation is correct; however, the administrative record does acknowledge that there are three postage meter customers in the Avalon community: Avalon ISD, Phillip Services, and CSE Disposal. Item No. 15, Post Office Survey, at 1.

available over the counter for retail customers at Avalon. FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Avalon Post Office, at 1. A letter from the Manager of Post Office Operations, San Antonio, TX, was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Avalon Post Office was warranted, and that effective and regular service could be provided through carrier delivery and retail services available at the Italy Post Office. The letter invited customers to complete and return a customer questionnaire wherein they could express their opinions about the service they were receiving and the effects of a possible change involving carrier delivery. Item No. 21, Letter to Customer, at 1. The returned customer questionnaires⁹ and Postal Service response letters appear in the administrative record in Item No. 22.¹⁰ In addition, representatives from the Postal Service were available at the Avalon Post Office for a community meeting¹¹ on June 1,

⁹ Petitioner raises concerns about the way question no. 3 was accounted for in the Questionnaire Analysis. The Petitioner states that the question gives four choices but only three are indicated in the report. Three are only indicated in the report because that is all that is necessary to prepare an analysis of the responses. The responses "Better" and "Just as Good" would both be considered favorable responses; therefore they would be included in the same category. The Petitioner also raises concern with the explanation portion of question no. 3. There is no indication that customers were confused as to what the question was asking. In fact, several customers answered question no. 3 and provided an explanation. See Item No. 22, Returned Customer Questionnaires, at 54,60,64,65,70,102,112,117,131,133,138,144,152,154, and 156. Moreover, the bottom of the questionnaire form provides an opportunity for customers to add any additional comments on a separate piece of paper to attach to the questionnaire. The Postal Service reviews and responds to each questionnaire taking all responses into consideration and no questionnaire respondent indicated that question no. 3 was confusing. See generally Item No. 22, Returned Customer Questionnaires.

¹⁰ Petitioner also raised concerns regarding the readability of the Questionnaire Analysis. The Petitioner contends that the language used in the report is at a readability level higher than that of the general public. The questionnaire analysis is prepared and used principally for the benefit of Postal Service employees to summarize information gathered from the questionnaires. While the analysis is available for public inspection, it is not intended to serve as a public relations communication, where considerations of readability are more salient.

¹¹ Petitioner mentions that questionnaires were not available from the representative at the meeting. However, questionnaires were distributed to 226 delivery customers of the Avalon Post Office and available over the counter for retail customers. FD at 2. No customer was denied the opportunity to

2011, to answer questions and provide information to customers.¹² FD at 2; Item No. 21, Letter to Customer, at 1; Item No. 24, Community Meeting Roster; Item No. 25, Community Meeting Analysis; Item No. 41, Revised Proposal, at 2. Customers received formal notice of the Proposal and Final Determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Avalon and Italy Post Offices¹³ from June 20, 2011 to August 21, 2011. FD, at 2; Item No. 36, Round-date stamped Proposals and Invitations for comments from affected offices, at 2-5. The Final Determination was posted at the same two Post Offices beginning on October 17, 2011, as confirmed by the round-dated Final Determination cover sheets that appear in the administrative record.

In light of a postmaster vacancy, minimal workload, declining office revenue,¹⁴ the variety of delivery and retail options (including the convenience of carrier delivery

complete a questionnaire and the community meeting was not the final instance where one could be completed by customers. According to the record, the meeting was held June 1, 2011 and Postal Response letters were not mailed until September 14, 2011. Customer questionnaires were responded to as late as three months after the meeting.

¹² Petitioner mentions that the community meeting was held at 2:00 p.m. on a Tuesday which was a time that was difficult for citizens to attend. However, over 70 customers attended the meeting. Item No. 24, Community Meeting Roster. In this particular instance, the venue of the meeting was changed at the request of the community to a larger facility in anticipation of high attendance. There is no record of a complaint regarding the time of the meeting; however, if a complaint had been received the Postal Service would have attempted to accommodate that request. The Postal Service notes that its internal regulations give local discontinuance coordinators flexibility in determining meeting times that encourage customer participation. See Handbook PO-101 § 251. No single time is ever consistent with all customer preferences; hours within an office's normal hours of operation generally suit customers who routinely visit that office, while inconveniencing customers who only occasionally visit the office, thereby conflicting with their work hours in many cases. Evening hours may suit the occasional customers, while inconveniencing regular customers. That is one reason why a discontinuance study process affords customers multiple avenues for providing their input: questionnaires, community meeting, written correspondence at any time, and if those opportunities do not suffice, then formal comments on a proposal posted for 60 days provide another means for submission of customer input.

¹³ The Italy Post Office is not a candidate facility within the Retail Access Optimization Initiative (RAOI). See Docket No. N2011-1, USPS LR-N2011-1/11 Rev 1, at <http://www.prc.gov/prc-pages/library/detail.aspx?docketId=N2011-1&docketPart=Documents&docid=75971&docType=Library%20References&attrID=&attrName=>.

¹⁴ See note 7 and accompanying text,

and retail service),¹⁵ very little recent growth in the area,¹⁶ minimal impact upon the community, and the expected financial savings,¹⁷ the Postal Service issued the Final Determination.¹⁸ Regular and effective postal services will continue to be provided to the Avalon community in a cost-effective manner upon implementation of the final determination. FD at 2.

Each of the issues raised by the Petitioner is addressed below.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Avalon Post Office on postal services provided to Avalon customers. The closing is premised upon providing regular and effective postal services to Avalon customers.

Petitioner, in his letter of appeal, raises the issue of the effect on postal services of the Avalon Post Office's closing, noting the convenience of the Avalon Post Office and requesting its retention. First, Petitioner expresses concern about customers having to travel to another Post Office for service. The Petitioner contends that upon implementation of the Final Determination, there will be no immediate service for retail customers, and customers will experience delays in conducting transactions with the carrier. The Postal Service explained that services provided at the Post Office will be available from the carrier and that customers will not have to travel to another Post Office. FD at 2. Carriers serve as a "Post Offices on Wheels" because they provide delivery and retail services to roadside mailboxes or CBUs close to customer

¹⁵ FD at 2-5.

¹⁶ FD at 4; Item No. 16, Community Survey Sheet, at 1.

¹⁷ FD at 4; Item No. 16, Community Survey Sheet, at 1; Item No. 29, Proposal Checklist, at 2.

¹⁸ FD at 2-5.

residences. FD at 3. If customers prefer immediate service, they can always meet the carrier at the mailbox or visit any Post Office or alternate access location to obtain postal services.

Petitioner finds the Postal Service's response that stamps are also available online at usps.com to be unsatisfactory to customers without internet access. FD at 2. The Postal Service informed customers of the many options that are available to obtain postal services without having to travel to a Post Office. One of these options for customers who do have access to computers is to purchase stamps online from the Postal Service's website. For customers who do not have access to computers, stamps may still be purchased at many stores and gas stations where customers already shop, or by calling a toll free number, 1-800-STAMP-24. FD at 2.

Petitioner expresses concern about mail security. The Petitioner states that customers will have to purchase a more expensive mailbox or modify their current one in order to accommodate their security concerns. However, the Postal Service addressed this concern by offering to install CBUs. CBUs are free-standing delivery receptacles purchased and maintained by the Postal Service at no expense to customers. FD at 4, Item No. 29, Proposal Checklist, at 2. The use of CBUs will enhance security options for delivery customers, since each receptacle is individually locked. The locking mechanism of each receptacle should alleviate customer concerns regarding the security of their mail and leaving money in unsecured receptacles.

Further, the Postal Service solicited information from law enforcement by sending a questionnaire to the Postal Inspection Service concerning mail theft and vandalism in the area. Records of the Inspection Service indicate that there have only been three

reported incidents of mail theft or vandalism in the area, thereby indicating that mail security concerns are not prevalent in the area. Item No. 14, Inspection Service/local law enforcement vandalism report, at 1.

Petitioner expresses concern about the services available from the carrier. Specifically, Petitioner states that the Postal Service response implies that residents must be at home to meet the carrier, which may impose a hardship for physically challenged customers. The community survey indicates that the Avalon community is mostly comprised of small businesses, farmers, and retirees. FD at 4; Item No. 16, Community Survey, at 1. Thus, many customers should be within the Avalon community when the carrier arrives, thereby enabling them to obtain services from the carrier. In the event customers are not at home when the carrier arrives, the Postal Service explained that most transactions do not require meeting the carrier at the mailbox. FD at 2. Stamps by Mail and Money Order Application forms are available for customer convenience. FD at 2. In addition, customers are not restricted to obtaining services from the carrier upon the closing of the Avalon Post Office; customers are welcome to visit any Postal Service facility or alternate access location within their immediate vicinity to obtain services.

Petitioner expresses concern for senior citizens and other members of the community who receive medicine through the mail. The Postal Service explained that carrier service is especially beneficial for senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes or CBUs. FD at 3. The Postal Service explained that special provisions can

be made for customers with special needs. FD at 3.¹⁹

Petitioner states that the carrier will serve the community during irregular hours. The Postal Service explained that carriers have a schedule and are required to leave on time. FD at 3. CBU delivery will likely enhance the predictability of the carrier's daily delivery schedule because the carrier will be delivering mail at one centralized location, and therefore daily fluctuations in delivery stop volume will have less impact on the carrier's travel time in the vicinity. However, there may be instances where various circumstances outside of the Postal Service's control interfere with the delivery schedule. Despite these delays, carriers will strive to serve the community in a timely fashion and on a regular basis.

Petitioner further questions package delivery and pickup. Petitioner contends that leaving items out on the porch or in carport is not an acceptable practice. The Postal Service addressed this concern, however, by offering to install CBUs, which will have parcel lockers for parcel delivery. Therefore, customers electing to receive service via CBU do not have to be concerned about packages being left on a porch or under a carport or being delivered to a gated property. FD at 3. If a package is too large to fit in the parcel locker, the carrier will leave a notice in the customers mailboxes letting them know that they can pick the package up at the Post Office or request redelivery. See Domestic Mail Manual § 508.1.1.7; Postal Operations Manual §§ 619.2, 812.4. The rural carrier will also accept letters, flats or packages up to 13 ounces for mailing.²⁰ The

¹⁹ To make alternative delivery arrangements in advance, customers can complete a PS Form 4232 entitled "Rural Customer Delivery Instructions," which allows customers to designate alternative locations for delivery of parcels. This form is available at the local Post Office or online at <http://about.usps.com/forms/ps4232.pdf>.

²⁰ A rural carrier is also permitted to pick up packages weighing 13 ounces or more if the package is

carrier will estimate the cost and provide a receipt for any money received. On the following delivery day the carrier will provide change or a bill for the amount over the estimate. The Postal Service is well aware of the security concerns regarding the monetary transactions that will occur between carriers and customers and has taken all necessary precautions to reduce incidences of criminal activity.

Petitioner also questions why this Post Office is being discontinued while others are retained. The Postal Service explained that Post Offices are reviewed on a case-by-case basis and when there is a vacancy²¹ in a small office, it is customary for the Postal Service to conduct a study of the business activity and investigate the feasibility of providing service by alternative means. FD at 3. The Avalon Post Office, along with other Post Offices within the Rio Grande District, are being studied for possible closure.

Petitioner suggests that the closing was predetermined. However, local field personnel further could not predetermine the outcome, because the final determination was approved at Headquarters upon review of the information compiled in the administrative record.

Petitioner states that the school uses a postage meter, which is set to credit the Avalon Post Office, and that this information was not shown in the findings. Item No. 15, Post Office Survey, at 1.²² However, only retail transactions are counted when evaluating the annual revenues of any postal installation.²³ Accordingly, the Postal

shipped by a known customer, does not have stamps applied, and includes a return address that matches the pick-up point. It is not necessary for customers to meet the carrier to utilize this service, as customers have the option of placing the package and payment in their delivery receptacle for pick-up by the carrier.

²¹ See Note 5 and accompanying text

²² See Note 8 and accompanying text.

²³ As the Commission learned during Retail Access Optimization, PRC Docket N2011-1, that the Postal

Service correctly applied its standard approach to calculating the annual revenues of the Avalon Post Office. Since revenue from permit/meter customers is not typically accepted across the retail counter,²⁴ such revenues are not necessarily tied to any particular postal installation's location. Moreover, attributing a permit/meter customer's revenues to a particular Post Office would distort the portrait of an office's retail activities, thereby constraining any cross-facility comparison of the business activity at the installation being reviewed.

In sum, the Postal Service has considered the impact of closing the Avalon Post Office upon the provision of postal services to Avalon customers. The carrier can provide similar access to retail service, alleviating the need to travel to the Post Office. FD at 2-5; Item No. 23, Postal Customer Questionnaire Analysis, at 2-3; Item No. 25, Community Meeting Analysis, at 1. Thus, the Postal Service has properly concluded that all Avalon customers will continue to receive regular and effective service.

Effect Upon the Avalon Community

The Postal Service is obligated to consider the effect of its decision to close the Avalon Post Office upon the Avalon community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Service utilizes a single definition of retail revenue that extends across all facilities.

²⁴ Revenues from permit/meter customers are typically accepted through Bulk Mail Entry Units, carriers, or Postal Service drop boxes.

Avalon is an unincorporated rural community located in Ellis County. The Ellis County Waxahachie Police Department provides police protection. The community is administered politically by Ellis County Waxahachie, with fire protection provided by the Avalon Volunteer Fire Department. The questionnaires completed by Avalon customers indicate that, in general, the retirees, farmers, commuters, and others who reside in Avalon must travel elsewhere for other supplies and services. See generally FD at 4; Item No. 22, Returned customer questionnaires and Postal Service response letters.

The Petitioner states that Avalon, TX also includes a school district of 321 students and 50 employees across the street from the Post Office. However, the Postal Service did consider the presence of the school by listing it as a business located in the Avalon community. FD at 4.

Petitioner expresses concern that the Avalon Post Office has been a steadfast landmark to the Avalon community for decades. The Postal Service researched this matter and concluded that the Avalon Post Office is neither a state nor national landmark. Item No. 16, Community Survey Sheet, at 1.

Petitioner's concern regarding the loss of the community bulletin board at the Post Office was also addressed in the record. The Postal Service explained that many retail outlets and grocery stores are now displaying a public bulletin board in which items can be posted for sale, and/or lost and found items can be posted. FD at 4. However, the Petitioner contends that there are no retail outlets or grocery stores in Avalon, only a small restaurant café. To the extent that there are no alternatives, the Postal Service notes that the CBU location may serve as an appropriate gathering place for the exchange of information among community residents. In addition, the Italy Post

Office may have a public bulletin board which may be used to post the information.²⁵

FD at 4.

The Petitioner also alleges that the Postal Service is incorrect in stating that the Avalon community has experienced minimal growth in the recent years. The Petitioner contends that the Postal Service has overlooked the growth of the local school district in the last seven years. The Petitioner specifically refers to the “Non-Metropolitan Fast Growing” categorization given to Avalon ISD by the Texas Education Agency. The Postal Service explained that the growth of a community does not depend on the location of a Post Office. FD at 4. Growth in a school district differs vastly from that of a residential community. Furthermore, there are no facts to indicate that all 321 students who attend Avalon ISD reside in the Avalon community. Despite the growth that has occurred at Avalon ISD over a seven year span, the revenues for Avalon Post Office have steadily declined for the last three years. FD at 2. The retail window at the Avalon Post Office averaged only 17 transactions accounting for 19 minutes of retail workload daily. FD at 2. The decline in revenue, combined with minimal workload, weighs in favor of the Postal Service’s determination that carrier service will be able to accommodate future growth in the Avalon community.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Avalon Post Office on the community served by the Avalon Post Office.

²⁵ Petitioner contends that posting information at the Italy Post Office will be futile to the Avalon community. Upon the closure of the Avalon Post Office the Italy Post Office will serve the Avalon community. Customers who visit the Italy Post Office from the Avalon community will therefore have the opportunity to view postings at that office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that carrier service would cost the Postal Service substantially less than maintaining the Avalon Post Office and would still provide regular and effective service. Item No. 21, Letter to Customer, at 1. The estimated annual savings associated with discontinuing the Avalon Post Office are \$49.67900. FD at 4; Item No. 29, Proposal Checklist, at 2.

The Petitioner contends that the Postal Service did not include revenue generated in fiscal year 2010 in the amount of \$22,188.00. The economic savings calculation is intended to measure the cost savings to the Postal Service, not the potential revenue loss that could arise by the absence of a postal presence in the community. Nevertheless, it is not unreasonable to assume little or no change in customer usage patterns.

Petitioner also states that there was no discussion at the community meeting of alternative cost reduction efforts. However, the Postal Service is only responsible for formulating a specific proposal and evaluating it in the context of Title 39, U.S. Code, and applicable regulations. In this case, the Postal Service has determined that carrier service, coupled with service at nearby Post Offices, is a reasonable solution that will yield economic savings. In so doing, the Postal Service is not required to evaluate and reject alternative proposals. In this case, the Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations.

Petitioner questions whether the Postal Service has accounted for additional

costs for labor, daily fuel, vehicle maintenance that will be needed to pick up and deliver mail throughout the community. The Postal Service appropriately applied its standard financial analysis which takes into account the following cost drivers: the number of additional boxes to be added to the rural route; the additional volume that may be expected per additional box; the number of additional miles to be added to the route; and the total additional annual hours that will be required to service the route. Item No. 17 at 2. The Postal Service's approach is both defensible and reasonable; moreover it is efficient while adding comparability across discontinuance studies.

Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD at 4.

The Postal Service determined that carrier service is more cost-effective than maintaining the Avalon postal facility and postmaster position. FD at 4. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The postmaster retired on January 1, 2010. Since the postmaster vacancy, a noncareer officer-in-charge (OIC) was installed to operate the office. Upon implementation of the Final Determination, attempts will be made to reassign the noncareer OIC to a nearby

office. The record shows that no other employee would be adversely affected by this closing. FD, at 4; Item No. 15, Post Office Survey Sheet, at 1. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Avalon Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Avalon Post Office on the provision of postal services and on the Avalon community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Avalon customers through carrier service. FD at 4. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Avalon Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Avalon Post Office be affirmed.

Respectfully submitted,

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